

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:)	Chapter 7
)	
Connie Jean Balderson)	
)	
and)	Case No. 16-31532-KRH
)	
Albert Lee Balderson,)	
)	
Debtors.)	

**TRUSTEE’S MOTION TO EXTEND TIME TO OBJECT
TO THE GRANTING OF THE DEBTOR’S DISCHARGE
AND TO EXTEND TIME TO FILE A COMPLAINT
OBJECTING TO DISCHARGE AND NOTICE THEREOF**

Peter J. Barrett, Chapter 7 Trustee in the above-captioned case of Connie Jean Balderson and Albert Lee Balderson (the “Debtors”), hereby requests this Court to defer the granting of a discharge to the Debtors and extend the time to file a complaint objecting to the discharge to and including August 30, 2016 pursuant to Rules 4003 and 4004 of the Federal Rules of Bankruptcy Procedure, and in support thereof, states as follows:

1. On or about March 29, 2016 (the “Petition Date”), the Debtors filed for relief pursuant to Chapter 7 of the Bankruptcy Code, 11 U.S.C. §§ 101, et seq. (the “Bankruptcy Code”).
2. Peter J. Barrett, Trustee (the “Trustee”) was appointed interim trustee and serves as Trustee in this case.
3. The § 341 meeting of creditors (the “341 Meeting”) was held on May 2, 2016 and then adjourned until June 27, 2016 and again to July 25, 2016 to allow the Trustee time to receive and review additional requested documents.
4. The current date by which parties must object to the granting of the Debtor’s discharge and file a complaint objecting to the Debtor’s discharge is July 1, 2016.

5. The Trustee requests that the Debtor's discharge be deferred and the time to object to the Debtor's discharge be extended through and including August 30, 2016 to allow the Trustee to receive and review the requested documentation and to conduct any additional adjourned 341 Meetings with respect to the same.

6. Pursuant to Local Rule of Bankruptcy Procedure 9013-1(G), and because there are no novel issues of law presented, the Trustee requests that the requirement that all motions be accompanied by a written memorandum be waived.

WHEREFORE, the Trustee hereby requests this Court to enter an Order, deferring the Debtor's discharge and extending the time to object to the Debtor's discharge through and including August 30, 2016, and awarding any further relief the Court deems proper.

PETER J. BARRETT, TRUSTEE

By: /s/ Peter J. Barrett
Trustee

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Chapter 7 Trustee

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of July, 2016, a true and correct copy of the foregoing Trustee's Motion To Extend Time To Object To The Granting Of The Debtor's Discharge And To Extend Time To File A Complaint Objecting To Discharge was served via ECF to:

Robert B. Van Arsdale, Esquire
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/s/ Peter J. Barrett

Trustee